



Signed and Filed: August 9, 2021

A handwritten signature in dark ink, reading "Dennis Montali", is positioned above the printed name of the judge.

DENNIS MONTALI
U.S. Bankruptcy Judge

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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION BY AND
BETWEEN REORGANIZED
DEBTORS AND GABRIEL
SENICERO**

1 The Court having considered the *Stipulation By and Between Reorganized Debtors and*
2 *Gabriel Senicero*, dated August 5, 2021 [Dkt. No. 11023] (the “**Stipulation**”),¹ entered into by
3 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
4 debtors and reorganized debtors (collectively, the “**Debtors**” and as reorganized pursuant to the
5 Plan, the “**Reorganized Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”) and
6 Gabriel Senicero (“**Senicero**”); and pursuant to such Stipulation and agreement of the Parties, and
7 good cause appearing,

8 IT IS HEREBY ORDERED THAT:

- 9 1. The Stipulation is approved.
- 10 2. Upon the date of the entry of this Order, the Plan Injunction shall be modified, to the
11 extent necessary, solely to permit Senicero to liquidate the claims against the Utility asserted in
12 the Proofs of Claim by prosecuting the State Court Action through final judgment and any appeals
13 thereof, but not to permit enforcement of any such judgment, which judgment, if any, shall be
14 recoverable solely as a General Unsecured Claim in accordance with the Plan and through the
15 claims reconciliation process in these Chapter 11 Cases.
- 16 3. Upon the date of the entry of this Order, the Stipulation shall be deemed an
17 objection by the Reorganized Debtors to each of the Proofs of Claim, and each Proof of Claim
18 shall be considered a Disputed Claim. Each Proof of Claim shall be deemed an Allowed Claim on
19 the earlier of (a) the date on which the Proof of Claim becomes an Allowed Claim pursuant to
20 written agreement between the claimant and the Reorganized Debtors, or (b) sixty (60) days after
21 either Party files notice in the Bankruptcy Court that a judgment liquidating the underlying claim
22 has been entered in the State Court Action and all appeals from such judgment have been
23 concluded or the time to appeal has expired, provided that if, as permitted by paragraph 4(a)
24 hereof, the Reorganized Debtors further object to the Proof of Claim on any specific grounds not
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27 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to
28 them in the Stipulation.

1 precluded by a final judgment in the State Court Action, the Proof of Claim shall remain Disputed
2 and shall not be Allowed without further Order of the Bankruptcy Court.

3 4. Nothing herein is intended, nor shall it be construed, to be:

4 a. a waiver by the Reorganized Debtors or any other party in interest, of any right to
5 object to the Proofs of Claim on any grounds not precluded by a final judgment in
6 the State Court Action, or

7 b. a waiver by Senicero of his rights to oppose any asserted challenge to any Proof
8 of Claim, or

9 c. a waiver by any Party of any claim or defense in the State Court Action.

10 5. The Reorganized Debtors have reserved all rights to object to the Proofs of Claim on
11 any basis, including that Proof of Claim No. 107043 was not timely filed.

12 6. The Stipulation shall be binding on the Parties and each of their successors in interest.

13 7. The Stipulation shall constitute the entire agreement and understanding of the Parties
14 relating to the subject matter thereof and supersedes all prior agreements and understandings relating
15 to the subject matter hereof.

16 8. This Court shall retain jurisdiction to resolve any disputes or controversies arising
17 from this Order or the Stipulation.

18
19 APPROVED AS TO FORM AND CONTENT:

20 Dated: August 5, 2021

21
22 BRADY LAW GROUP

23 /s/ Steven J. Brady

24 Steven J. Brady

25 *Attorneys for Gabriel Senicero*

26
27 *** END OF ORDER ***
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